

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 11 V
Industrial Food Truck, LLC

(DEBTOR) : Bankruptcy No. 20-13275AMC11V

OBJECTION TO CLAIM #4 OF WILLIAMS SCOTSMAN, INC

1. Debtor filed for protection under Chapter 11 V on August 7, 2020.
2. Jami Nimeroff was appointed as Chapter 11 V Trustee.
3. The claims deadlines as set by the court is October 20, 2020.
4. Creditor Williams Scotsman, Inc. was listed as a disputed claim on schedule F.
5. Williams Scotsman, Inc. filed the attached claim #4 on September 21, 2020 for an unsecured amount of \$21,699.23 for leased equipment. Exhibit A.
6. The leased equipment that was installed was done so without meeting the license and inspections code for the City of Philadelphia.
7. Further the water system did not meet the health department codes.
8. Debtor was therefore without water for six to seven months, including hot water issues that adversely affected the operations and earnings of Debtor.
9. Prior to the filing, Debtor contested without reply.

WHEREFORE, Debtor avers that the claim in its entirety should be denied and stricken or alternatively allowed at an amount the court deems fair and just.

Respectfully submitted,

Date: October 1, 2020

BY: /s/ Michael A. Cataldo
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